

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

Justin S. O'Neill,

Plaintiff,

vs.

Deniz M. Segin,

Defendant

Case No. 4:19-cv02686 DNN

CONSENT JUDGMENT

WHEREAS, presently pending before this court is Plaintiff's petition brought pursuant to the Convention on the Civil Aspects on International Child Abduction done at the Hague on 25th October 1980 (The Convention) and 42 USC section 11601 et. seq., The International Child Abduction Remedies Act (ICARA).

WHEREAS, the parties have entered into settlement negotiations regarding the resolution of Plaintiff's petition; and

WHEREAS, the parties agree and stipulate as follows:

- 1. Plaintiff and Defendant shall follow an interim physical custody schedule that rotates during a 28-day period, to wit:**

 - a. Defendant has custody of child L.F.O. for a period of 5-consecutive days;**
 - b. Plaintiff has custody of child L.F.O. for a period of 5-consecutive days;**
 - c. Defendant has custody of child L.F.O. for a period of 4-consecutive days;**
 - d. Plaintiff has custody of child L.F.O. for a period of 3-consecutive days;**
 - e. Defendant has custody of child L.F.O. for a period of 5-consecutive days;**

and

f. Plaintiff has custody of child L.F.O. for a period of 6-consecutive days.

2. The schedule set forth above began at 6:00 pm on September 25, 2019 on subparagraph 3 wherein Defendant has custody of L.F.O. for a period of 4-consecutive days.

3. Plaintiff, Defendant, and L.F.O. shall repatriate to their habitual residence of ~~Brisbane, Australia no sooner than January 4, 2020 and no later than January 29, 2020,~~ ^{2 NOV.} AND L.F.O. SHALL NOT LEAVE USA BEFORE 26 DECEMBER 2019 UNLESS AGREED OTHERWISE IN WRITING AFTER THIS AGREEMENT IS SIGNED.

4. A copy of this CONSENT JUDGMENT shall be filed in Case No. BRC 4006/2019 pending in the Family Court of Australia at Brisbane and the Federal Circuit Court of Australia at Brisbane. Plaintiff and Defendant shall conduct their pending dissolution of marriage, child custody, child support, division of property, and division of debt matters in Case No. BRC 4006/2019 pending in the Family Court of Australia at Brisbane and the Federal Circuit Court of Australia at Brisbane.

5. A copy of this CONSENT JUDGMENT shall be filed in Case No. 1922-FC00246 pending in the Circuit Court of the City of St. Louis, State of Missouri. Said filing is for sole purpose of enforcement of the schedule set forth above in paragraphs 1, 2, and 3 if necessary and shall not convey jurisdiction upon said Court to enter any orders and/or judgments regarding the parties' pending dissolution of marriage, child custody, child support, division of property, and division of debt matters. Case No. 1922-FC00246 shall be dismissed upon the first of the following to occur: (a) the repatriation of the Plaintiff, Defendant, and LFO to Brisbane, Australia; or (b) January 29, 2020.

With the entry of this CONSENT JUDGMENT, the Plaintiff and Defendant agree that the above resolves Plaintiff's petition currently pending before this Court.


Justin S. O'Neill, Plaintiff

2 Nov 2019.


Deniz M. Sezgün, Defendant

The Marks Law Firm, L.L.C.



Jonathan D. Marks #47886
Attorney for Plaintiff
Four City Place Drive, Suite 497
Creve Coeur, Missouri 63141
(314) 993-6300 Phone
(314) 993-6301 Fax

Stange Law Firm, PC



John D. Kershman #56357
Attorney for Defendant
120 S. Central Avenue, Suite 450
Clayton, Missouri 63105
(314) 993-6300 Phone
(314) 963-9191 Fax

SO ORDERED

Entered: _____